

U.S. Department of Justice

United States Attorney Southern District of New York

26 Federal Plaza, 37th Floor New York, New York 10278

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BY ECF

The Honorable Valerie E. Caproni United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007



Re: United States v. Alon Alexander, Oren Alexander, and Tal Alexander

24 Cr. 676 (VEC)

Dear Judge Caproni:

The Government writes to update the Court on the status of proceedings in the Southern District Florida and to request the Court vacate the currently scheduled bail appeal hearing for Tal Alexander and instead schedule a consolidated hearing to decide the bail appeals/bail applications of all three defendants on January 10, 2025. The request for the consolidated hearing is jointly made by the Government and the defendants.

All three defendants have now been arrested and made initial appearances in the Southern District of Florida. Magistrate Judges in that district have ordered that Alon and Tal Alexander be detained pending trial and that they be removed to the Southern District of New York. Tal Alexander has filed an appeal of his detention order with the Court, and Alon Alexander also intends to appeal his detention order. Tal Alexander's bail appeal hearing is currently scheduled for January 8, 2025.

After a second adjournment, Oren Alexander is scheduled for a detention and removal hearing in the Southern District of Florida on Tuesday, January 7, 2025. Counsel for Oren Alexander, Richard Klugh, has informed the Government that his client intends to waive further proceedings in Florida and will ask this Court to decide his bail application in the first instance.

The parties jointly request that the Court hold a consolidated hearing on Friday, January 10, 2025 to decide the bail appeals of Alon and Tal Alexander and the initial bail application of Oren Alexander. All three defendants are currently in federal custody in Miami, and defense counsel have represented they will waive their clients' presence at the bail hearing. In advance of

the hearing, the parties propose that the defendants submit any materials by January 7, 2025 and the Government submit any materials by January 8, 2025.

Respectfully submitted,

EDWARD Y. KIM Acting United States Attorney

By: /s Kaiya Arroyo Elizabeth A. Espinosa Andrew W. Jones **Assistant United States Attorneys** (212) 637-2226/-2216/-2249

Cc: Counsel for Alon Alexander (by e-mail) Counsel for Oren Alexander (by e-mail) Counsel for Tal Alexander (by ECF)

Application GRANTED. The bail appeal hearing for Defendant Tal Alexander scheduled for Wednesday, January 8, 2025, at 10:00 A.M. is vacated. All parties must appear for a consolidated bail hearing on Wednesday, January 15, 2025, at 1:30 P.M. to decide the bail appeals of Defendants Alon and Tal Alexander and the initial bail application of Defendant Oren Alexander. The hearing will take place in **Courtroom 20C** of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007,

Defendants must submit any materials in support of their bail applications by not later than Wednesday, January 8, 2025. The Government's response must be filed by not later than Friday, January 10, 2025. Defendants' reply papers, if any, are due by Monday, January 13, 2025, at 3:00 P.M.

The Government's application indicates that Defendants are willing to waive their right to be present at the consolidated bail hearing. If Defendants have been removed to this district by January 15, 2025, they must appear; if they have not yet arrived in this district by January 15, 2025, the Court will proceed based on their waiver of their right to be present.

1/7/2025

SO ORDERED.

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE